



September 27, 2004

Bill Moore, PE
Stormwater Technical & Policy Lead, Water Quality Program
Industrial Stormwater General Permit
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: Comments on Ecology Industrial Stormwater General Permit, Public Review Draft,
August 2004

Dear Bill:

Thank you for the opportunity to comment on the Ecology Industrial Stormwater General Permit. We have several comments on revisions that have been made to the permit as indicated below.

① Page 15; S.3.C.1.h and S.3.C.2.c. The permit should not conditionally approve incidental windblown mist from cooling towers as a non-stormwater discharge. As a result of the evaporative cooling process, cooling towers concentrate dissolved solids present in the makeup water or added as water conditioners. Cooling tower mist contains elevated concentrations of metal salts that, when deposited on rooftops or areas adjacent to the cooling tower, accumulates and gets washed into stormwater. Stormwater impacted by salts from cooling tower mist should be regulated by Ecology as a discharge associated with industrial activity.

② Page 27; S.3.C. Action Levels. Analytical laboratories normally report results only to three significant figures¹. Presenting action levels to four significant figures as with Total Copper and Total Lead indicates an unrealistic and probably unintended level of precision. For clarity and comparability to results that would be submitted by permit holders, we suggest rounding the Total Copper and Total Lead action levels to three significant figures.

③ Pages 27 and 28; S.4.C. Level Two Response, Level Three Response. The word "promptly" is unclear and should be replaced with a specific time interval. An interval of two weeks would be consistent with the Level One Response.

④ Page 28; S.4.C. Level Three Response. Submittal of the level three source control report on the same schedule as implementation of additional source controls does not allow a response time by Ecology should the report be deemed insufficient. Designating a report submittal schedule that is shorter than the implementation period may allow Ecology to have input to the selected source controls.

⑤ Page 28; S.4.C. Level Two Response, Level Three Response, 2). The word "all" sets an unreasonable expectation for permit holders as to the extent of investigation required and may effectively delay implementation of controls that would reduce discharges of the pollutants of concern.

⑥ Page 28; S.4.C. Level Three Response, 6). There is a grammatical error in the second sentence "of initiating the a level three."

⑦ Page 42; S.7.E.2. The stormwater technical manuals approved by Ecology² are written predominately to address stormwater pollutants, pollutant concentration, and composition from non-point source runoff. Stormwater pollutants, concentrations, and

¹ Personal telecommunication with Brian Cone, North Creek Analytical, September 24, 2004.

² Presumed to be Stormwater Management Manual for Western Washington and Stormwater Management Manual for Eastern Washington

composition from industrial facilities are considerably different and more variable from location to location than for non-point source runoff. Treatment BMPs and source control strategies applicable to industrial sites are necessarily different than those applicable to non-point sources. The Industrial Stormwater General Permit is designed to regulate the unique aspects of industrial stormwater runoff and should not refer to technical manuals written predominately to address and control non-point source runoff. The reference to approved manuals makes compliance with the Industrial Stormwater General Permit confusing and sets up opportunity for conflict between the approved manuals and the Permit.

As an example, the enhanced treatment menu³ of the Stormwater Management Manual for Western Washington (SMMWW) stipulates that "Areas of multifamily, industrial and commercial project sites that are identified as subject to Basic Treatment requirements⁴ are not subject to Enhanced Treatment requirements." Facilities which discharge to any of the 29 rivers and five lakes designated in Appendix V-A are required to select BMPs from the Basic Treatment Menu. However, the SMMWW designates the application types to which the basic treatment menu⁵ applies, and there is no reference in that list to applications with stormwater discharges associated with industrial activity.

⑧ Page 45; S.9. Similar comment to above. The reference to approved stormwater technical manuals should be eliminated because treatment BMPs and source control strategies applicable to industrial sites are necessarily different than those applicable to non-point sources.

⑨ Page 49; S.9.B.3. Same comment as above with regard to the reference to approved stormwater technical manuals.

³ Stormwater Management Manual for Western Washington, Volume V, Section 3.4

⁴ Stormwater Management Manual for Western Washington, Volume V, Appendix V-A designates 29 rivers and five lakes as Basic Treatment Receiving Waters

⁵ Stormwater Management Manual for Western Washington, Volume V, Section 3.5



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Page 49; S.9.B.3. There is a word missing in the first sentence of the amended text:
"The SWPPP must [include] a description..."

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Page 51; S.9.B.3.c. Same comment as above with regard to the reference to approved stormwater technical manuals for guidance on selecting treatment BMPs.

End of Comments

We appreciate having the opportunity to offer suggestions for improvement to the Industrial Stormwater General Permit. If you should have any questions regarding these comments or would like clarification of any of the points we've made herein, please contact me at (800) 548-4667.

Sincerely,

Stormwater Management, Inc.

Calvin P. Noling, PE
Director of Industrial & Remediation Business

